

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	: <b>CHAPTER 13</b>
<b>Michael Howard and</b>	:
<b>Joanna Howard</b>	:
<b>Debtors</b>	: <b>NO. 23-12779 djb</b>

**MOTION TO MODIFY AND ABATE CHAPTER 13 PLAN**

Debtors, Michael and Joanna Howard, by their attorney, Michael A. Latzes, Esquire, hereby applies to modify and abate their Chapter 13 Plan.

1. Debtors filed for Chapter 13 under the Bankruptcy Code with this Court on September 14, 2023. Debtors' Amended Chapter 13 Plan was confirmed on April 4, 2024.
2. Subsequent to confirmation, debtors fell behind on their trustee payments due to the fact that they were expecting receipt of a VA Disability Benefit, which has yet to be received. As a result, debtors sustaining a substantial loss of expected income over the periods of time in question have adjusted their budget to satisfy the modified trustee payment while continuing to pursue the VA Disability benefit.
3. Additionally the Amended Plan provides for a post confirmation supplemental attorney fee of Twelve Hundred (\$1,200.00) Dollars. (Debtors' counsel will be filing a Supplemental Fee Application)
4. The Amended Plan proposes to modify the plan by abating the trustee arrears of Thirteen Thousand One Hundred Seventy Three (\$13,173.00) Dollars and a supplemental attorney fee of One Thousand Two Hundred (\$1,200.00) Dollars, back into the Amended Plan as per Order to Modify. (The Amended Plan is attached hereto and marked Exhibit "A") (\$7,800.00 paid for the first 19 months and paying \$3,320.00 per month for the following 41 months starting in April, 2025. (Also attached are Amended Schedules I and J which are

attached hereto and marked Exhibits “B” and “C”)

WHEREFORE, Debtors request that this Honorable Court grant said Motion to  
Modify and Abate Chapter 13 Plan payments.

4-7-25  
Date

/s/ MICHAEL A. LATZES  
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